



IMPACT
NETWORK SOLUTIONS, INC.

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Customer Proprietary Network Information Annual Certification of Compliance
Pursuant to 47 C.F.R. § 64.2009(e)

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for year 2007.

Date filed: September 11, 2008

Company covered by this Certification: Impact Network Solutions, Inc.

Form 499 Filer ID: 821188

Name of Signatory: Daniel Newman

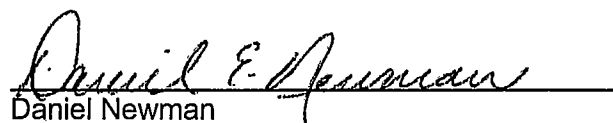
Title of signatory: President

I am the President of Impact Network Solutions, Inc. and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Impact Network Solutions, Inc. I have personal knowledge that Impact Network Solutions, Inc. has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how Impact Network Solutions, Inc. procedures ensure compliance with the requirements set forth in 47 C.F.R. § 64.2001 et seq.

Impact Network Solutions, Inc. received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Impact Network Solutions, Inc. has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2007. Impact Network Solutions, Inc. will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps the Company is taking to protect CPNI.

This certification is dated this 11th day of September, 2008.


Daniel Newman
President

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List ABCDE

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LIMA

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Customer Proprietary Network Information Certification Accompanying Statement

Impact Network Solutions, Inc. ("INSI") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 — 64.2011 of the Commission's rules. This attachment summarizes INSI's practices and procedures, which have been updated to adequately ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

Safeguarding against pretexting

- INSI takes reasonable measures to protect CPNI and believes that these measures sufficiently prevent unauthorized access to CPNI.

Training and discipline

- INSI has trained its personnel in the appropriate use of CPNI. All employees with access to CPNI are required to review COMPANY'S CPNI policies and procedures.
- INSI has disciplinary process in place for violations of COMPANY'S CPNI policies and procedures which would encompass any misuse of CPNI.

COMPANY'S use of CPNI

- COMPANY does not share, disclose, or otherwise provide CPNI to third parties.
- INSI may use CPNI for the following purposes:
 - > To initiate, render, maintain, repair, bill and collect for services;
 - > To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - > To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent; and
 - > To market additional services to customers that are within the same categories of service to which the customer already subscribes.
- INSI does not disclose or permit access to CPNI to track customers that call competing service providers.
- INSI discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

Customer approval and informed consent

- INSI does not use CPNI for any purpose that would require customer approval to do so. INSI does not use CPNI for any marketing purposes and does not share, disclose, or otherwise provide CPNI to any third party. If this policy changes in the future, INSI will implement practices and procedures to ensure compliance with the Commission's CPNI regulations.



I M P A C T
NETWORK SOLUTIONS, INC.

Additional safeguards

- INSI has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- INSI designates one or more officers, as an agent or agents of the company, to sign and file a CPNI Compliance Certificate on an annual basis. The Certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- INSI properly authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-person visit.
- INSI notifies customers immediately of any account changes.
- INSI may negotiate alternative authentication procedures for services that INSI provides to business customers that have both a dedicated account representative and a contract that specifically addresses INSI's protection of CPNI.
- In the event of a breach of CPNI, INSI will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs INSI to delay notification, or INSI and the investigatory party agree to an earlier notification. INSI will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.